

The Honorable Lauren King

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF J.L.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, J.L., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I have chosen to submit this declaration using only initials because I am fearful  
5 that the government could retaliate against me or my child, or individuals emboldened by recent  
6 actions of the Federal Government would target my family for speaking out.

7 3. I live in the Tri-Cities area of Washington State with my husband and our three  
8 children, ages 15, 13, and 16 months.

9 4. My current husband is the father of our 16-month-old child. My ex-husband is  
10 the father of my 15-year-old and 13-year-old.

11 5. I am a biochemist. My husband is an electrical engineer.

12 6. My oldest child, my daughter, is transgender. She was assigned a male gender at  
13 birth but identifies as female and uses she/her pronouns. I will refer to my daughter as “Child A”  
14 to protect her identity due to the heightened anti-trans rhetoric in the current political climate.

15 7. Child A is a freshman in high school. She is an incredible artist, loves being  
16 involved in her school’s drama program, and dreams of designing stage sets for Broadway  
17 someday. She also wants to be a U.S. Supreme Court Justice. She is bright, she loves animals,  
18 and animals love her. She has a great ear for music; she plays the violin and even won a music  
19 director’s award at her school. She excels in the arts without even trying, whether it’s drawing,  
20 designing, or playing music. It is all so natural for her and brings her immense joy. My daughter  
21 is a gem.

22 8. I first became aware of Child A identifying as a trans girl when she was almost  
23 thirteen years old. We were planning her brit mitzvah, which traditionally is a very gendered  
24 process, and I told her we should schedule her for a haircut. I noticed she kept dodging the  
25 subject. She finally came to me and said “I don’t want my hair cut, I am trans.” I told her then  
26 that I love her and that what she disclosed to me confirmed everything I’ve ever known about

1 her. She was so happy seeing my reaction, she told me it was the best day of her life. A huge  
2 weight lifted off her shoulders. She told my husband the following day and he had the same  
3 reaction as I did, full-fledged love and support. My daughter didn't feel comfortable telling her  
4 father she was trans until about six months later. She was afraid he would not accept her. After  
5 having the conversation with her father, she told me it felt weird, that he said the correct words  
6 but didn't feel the same acceptance she felt when she told my husband and me. She said her  
7 grandparents on her father's side were the same way when she told them she was trans. She feels  
8 like they don't get her and feels like she can't be herself around them. This has unfortunately  
9 continued to be a source of tension in my daughter's relationship with her father and  
10 grandparents.

11 9. Child A's social transition began around eighth grade. She began using her  
12 preferred name and pronouns with her friends and they were all very supportive of her. Through  
13 Child A's gender exploration, she has moved from he/him pronouns to he/they, to they/them, to  
14 she/they. Today she is finally fully comfortable using she/her pronouns.

15 10. My daughter's longtime therapist assessed her and provided a diagnosis of gender  
16 dysphoria. However, prior to pursuing medical gender-affirming care for my daughter, my first  
17 priority was to make sure any interventions were not only safe but also backed up by peer-  
18 reviewed research. It's the scientist in me; I didn't want to just take things at face value. I  
19 reviewed research conducted in both Europe and the United States to try to understand the best  
20 path forward for my daughter. I also consulted with my daughter about the kind of gender-  
21 affirming care she was looking for. She initially said she didn't know. I reassured her that not  
22 knowing right now was perfectly ok, she was only thirteen. We discussed puberty blockers and  
23 decided that would be a good first step as certain physical developments are difficult to counter  
24 in puberty after they begin. She understood and said she wanted puberty blockers.

25 11. My daughter's pediatrician made a referral for my daughter to obtain gender-  
26 affirming care at a gender clinic in Western Washington. In February 2023 I filled out paperwork

1 to join their waiting list, which at the time their website said the wait could be anywhere from  
2 six to eight months. I received an email in March 2023 inviting me to schedule an appointment  
3 for the following month. We were so fortunate to get scheduled as quickly as we did. Living in  
4 the Tri-Cities, we do all our appointments with the gender clinic virtually. My daughter had her  
5 bloodwork done locally and then her results would be sent to the gender clinic. My daughter  
6 began puberty blockers in August 2023. Her puberty blocker shots have to be administered in  
7 person, so the specialty pharmacy ships the prescription to my daughter's pediatrician and they  
8 administer it in their office. Despite living in an area that is not very accepting of the trans  
9 community, we are lucky to have a pediatrician that supports gender-affirming care and can  
10 coordinate with the gender clinic to get my daughter the medical care she needs.

11 12. Things seemed like they were going well. Then in December 2023, Child A  
12 started self-harming. She was texting her friends that she didn't want to live anymore. It was so  
13 scary. I discussed it with her therapist who then discussed it with Child A. After that, Child A  
14 completely shut down. She wanted nothing to do with me, because I had monitored texts on her  
15 phone. Then in the spring of 2024 my daughter tried to take her own life. She was admitted to  
16 the ER and afterward we took her to an inpatient facility for a few days while her mental health  
17 stabilized. After her inpatient stay, my daughter decided to stay with her father for about a month,  
18 despite not having the best relationship with him. I knew she needed time and space away and I  
19 wanted to help her in whatever way I could. As a parent, 2024 was the most difficult year of my  
20 life.

21 13. After that summer, things began to stabilize and my daughter's mental health has  
22 improved. Child A began estrogen therapy in April 2024, and this has provided real benefits for  
23 her mental health. Child A is so much happier. She will constantly come up to me and excitedly  
24 talk about how her fat stores are finally moving. She'll say, "Mom, I'm getting hips!" Since  
25 receiving gender-affirming care, the anxieties surrounding her gender dysphoria have noticeably  
26 lessened. On New Year's Eve 2024, we had her legal name changed to her preferred name.

1 Child A was so excited that she would be starting 2025 legally as the girl she knows herself to  
2 be. She attends a high school that we picked because it is welcoming and accepting to LGBTQ+  
3 students. The school administration readily accepted the change to our daughter's gender marker  
4 and name. At the school, our daughter joined the Gay/Straight Alliance club. Around her she  
5 sees other young LGBTQ+ students who are out. The benefits of a supportive school community  
6 for my daughter cannot be overstated. Last week she looked at me and said "Mom, I feel like  
7 I'm finally here." After everything my daughter has been through, I am so happy to finally see  
8 her feeling more confident and comfortable in who she is.

9 14. I am aware of the Executive Order putting conditions on gender-affirming care  
10 for youth. The announcement of the Executive Order immediately caused fear and anxiety in  
11 Child A. At that time Child A came to me and said, "Does this mean I don't get my estrogen?"  
12 Her first question was about her physical care. I explained to her where we were at with her  
13 treatments, that her puberty blocker and estrogen prescriptions were active through June. I told  
14 her we will do whatever it takes to ensure she continues to get the care she needs. We will fly  
15 her to another country if we have to. She understands that her family will do everything in our  
16 power to protect her and continue to get her the life-saving gender-affirming care she needs. I  
17 have to protect her.

18 15. Our family is fortunate to have the means to arrange gender-affirming care for  
19 our daughter. To finally be in this place and feel the risk that it could all be taken away is not  
20 fair. I know with every fiber of my being that if Child A is denied access to gender-affirming  
21 care, she will die. She is not the only one. It is apparent now that all transgender people and their  
22 families in the U.S., even in a progressive state such as Washington, face the same risk.


23 16. It is heartbreaking that my daughter has to live in fear and uncertainty when all  
24 she wants to do is exist as the person she knows herself to be. In a political environment where  
25 transgender people are treated as pawns, living as a transgender female is extraordinarily difficult  
26 and can lead to unsolicited hate and threats to personal safety. In addition to being a trans girl,

1 Child A is Jewish and half-Asian; these identities compounded together with the Federal  
 2 Government's Executive Order, provoke an overwhelming fear for our safety that I can't even  
 3 begin to describe. The Executive Order and other official actions to invalidate the humanity of  
 4 trans people make them targets of violence; the denial of gender-affirming care will make the  
 5 harm immeasurably worse for trans people. I teach Holocaust curriculum at a synagogue. I am  
 6 appalled to see parallels to that dark time in world history in the way that transgender people are  
 7 treated today.

8 17. I do not have the expertise or the resources to challenge the Federal Government's  
 9 Executive Order as a private plaintiff. Finding legal counsel competent to take on the Federal  
 10 Government would be the first hurdle. Even an LGBTQ+-supportive attorney in my local  
 11 community would probably not be up to the job. For that reason I am thankful that the  
 12 Washington State Attorney General's Office is bringing this lawsuit.

13  
 14 I declare under penalty of perjury under the laws of the State of Washington and the  
 15 United States of America that the foregoing is true and correct.

16 DATED this 18th day of February 2025.

17  
 18   
 19 J.L.  
 20 Parent of Child A  
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